

1 **EXHIBIT A**

2 **DEFINITIONS AND INSTRUCTIONS**

3 “You” means Perkins Coie, LLP.

4 “Documents” means, without limiting its generality, the original (or a copy
5 when the original is not available) and each non-identical copy (including those
6 which are non-identical by reason of notations and markings) of papers, writings
7 and records of any nature whatsoever, including, but not limited to, contracts,
8 agreements, correspondence, letters, e-mails, telegrams, wires, cables, reports,
9 schedules, diaries, statements, photographs, reproductions, maps, surveys, plats,
10 drawings, blueprints, sketches, charts, models, invoices, purchase orders, ledgers,
11 journals, checks, check stubs, notes, estimates, summaries, desk calendars, work
12 papers, studies, appointment books, time sheets, logs, inventories, printouts,
13 computer tapes, computer files, tape recordings, minutes of meetings, memoranda,
14 including intercorporate, intra-corporate, interoffice and intraoffice memoranda,
15 memoranda regarding conferences, notes of conversations or telephone
16 conversations and any and all written, printed, typed, punched, or recorded matter
17 of whatsoever kind of description, including drafts of any of the foregoing.

18 “Escrow” means the account that you maintained on behalf of Giga Watt
19 Pte. Ltd. with respect to the proceeds of the sale by Giga Watt Pte. Ltd. of tokens.
20 The sale took place from on or about May 27, 2017 to on or about July 31, 2017.

21 “Information” shall include individual documents and records (including
22 associated metadata) whether on paper, film, or other media, as discrete files
23 stored electronically, optically, or magnetically, or as a record within a database,

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1 archive, or container file, including emails, messages, word processed documents,
2 recordings of videoconferences or conference calls, digital presentations,
3 spreadsheets, database content, text messages, data recorded by Internet of Things
4 (IoT) devices, and messages in workplace collaboration tools (including, without
5 limitation, Slack, Microsoft Teams, and Google Hangouts) or ephemeral
6 messaging applications.

7 Electronically stored information (ESI) must be produced in its original
8 native format including its accompanying metadata. For example: (a) documents
9 created using Microsoft Word must be produced as .DOC or .DOCX files; and (b)
10 emails must be produced in a form that readily supports import into standard
11 email client programs.

12 These requests call for the production of all responsive documents in your
13 possession, custody or control. If any document was, but no longer is, in your
14 possession, subject to your control, or in existence, include a statement: (a)
15 identifying the document; (b) describing where the document is now; (c)
16 identifying who has control of the document; (d) describing how the document
17 became lost or destroyed or was transferred; and (e) identifying each of those
18 persons responsible for or having knowledge of the loss, destruction, or transfer of
19 the document from your possession, custody, or control.

20 If any document is withheld in whole or in part for any reason including,
21 without limitation, a claim of privilege or other protection from disclosure such as
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1 the work product doctrine or other business confidentiality or trade secret
2 protection, set out separately with respect to each withheld document:

- 3 (a) the ground of privilege or protection claimed;
- 4 (b) every basis for the privilege or protection claimed;
- 5 (c) the type of document;
- 6 (d) its general subject matter;
- 7 (e) the document's date; and
- 8 (f) other information sufficient to enable a full assessment of the
9 applicability of the privilege or protection claims.

10 To the extent you assert that a document contains information that should
11 be protected from disclosure (based on the attorney-client privilege, work product
12 doctrine, or another protection) and non-privileged information, the non-
13 privileged portions of the document must be produced. For each such document,
14 indicate the portion of the document withheld by stamping the words
15 "MATERIAL REDACTED [AS [BASIS FOR PROTECTION]]" on the document
16 in an appropriate location that does not obscure the remaining text.

17 DOCUMENT REQUESTS

18 1. All Information, including Documents, regarding the Escrow,
19 including, but not limited to, deposits and withdrawals, and any agreements with
20 respect to the Escrow.

21 2. Any agreement between Giga Watt, Inc. and Giga Watt Pte. Ltd.

22 3. Any agreement between Giga Watt, Inc. and Cryptonomos Pte
23 Ltd.